

Robert M. Bramson (SBN 102006)
rbramson@bramsonplutzik.com
BRAMSON, PLUTZIK, MAHLER &
BIRKHAEUSER, LLP
2125 Oak Grove Road, Suite 120
Walnut Creek, CA 94598
Telephone: (925) 945-0200
Facsimile: (925) 945-8972

Attorneys for Plaintiffs
ROYLENE RAY, KELLY CANNON, KARLA
HODGES and LAKETA COULTER

Additional Counsel on Signature Page

Jeffrey D. McFarland (SBN 157628)
jeffmcfarland@quinnemanuel.com
Stan Karas (SBN 222402)
stankaras@quinnemanuel.com
QUINN EMANUEL URQUHART
OLIVER & HEDGES
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
Telephone: (213) 443-3000
Facsimile: (213) 443-3100

Attorneys for Defendant GATEWAY, INC.

Douglas R. Young (SBN 073248)
dyoung@fbm.com
C. Brandon Wisoff (SBN 121930)
bwisoff@fbm.com
Anthony P. Schoenberg (SBN 203714)
tschoenberg@fbm.com
Morgan Jackson (SBN 250910)
mjackson@fbm.com
FARELLA BRAUN & MARTEL LLP
235 Montgomery Street, 17th Floor
San Francisco, CA 94104
Telephone: (415) 954-4400
Facsimile: (415) 954-4480

Attorneys for Defendants
BLUEHIPPO FUNDING, LLC and
BLUEHIPPO CAPITAL, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROYLENE RAY, KELLY CANNON,
KARLA HODGES and LAKETA
COULTER et al., individually and on
behalf of others similarly situated,,

Plaintiffs,

vs.

BLUEHIPPO FUNDING, LLC,
BLUEHIPPO CAPITAL, LLC and
GATEWAY, INC.,

Defendants.

Case No. C-06-1807 JSW EMC

**JOINT REQUEST OF ALL PARTIES FOR
THIRTY DAY STAY OF DEADLINES TO
PERMIT PREPARATION OF
DOCUMENTATION FOR CLASS
ACTION SETTLEMENT
AND ORDER THEREON**

Trial Date: February 1, 2010

1 Plaintiffs Roylene Ray, Kelly Cannon, Carla Hodges Laketa Coulter, Linda Pullum,
2 Mayra Ayar, Esperanza Ochoa and Janis Shoemaker (collectively "Plaintiffs"), defendants
3 BlueHippo Funding LLC, BlueHippo Capital, LLC (collectively "BlueHippo") and defendant
4 Gateway, Inc. ("Gateway"), by and through counsel, hereby stipulate as follows and respectfully
5 request the Court to enter the accompanying proposed order:

6 1. The parties reached a settlement in principle of all claims and issues in this
7 litigation on January 27, 2009 with the able and much appreciated assistance of the Honorable
8 Joseph C. Spero.

9 2. Because the settlement will include resolution of class claims, the settlement terms
10 will need to be submitted to the Court for preliminary approval and ultimately for final approval.
11 Preparation of the stipulation of settlement and the accompanying documents for preliminary
12 approval will require the input and review of several parties and their counsel as well as
13 verification of various customer data.

14 3. So as to permit them to complete these tasks, the parties respectfully request that
15 the Court: (1) vacate the hearing on BlueHippo's currently pending motion to dismiss (set for
16 February 20, 2009), suspend further briefing and withhold any decision on that motion; (2)
17 suspend all deadlines in connection with the class certification briefing and hearing (Plaintiffs'
18 motion is currently due on February 19, 2009 and a hearing is set for April 3, 2009); and (3)
19 temporarily stay, for a period of thirty (30) days, all litigation activity in the case unnecessary to
20 the preparation of the stipulation of settlement and preliminary approval papers (various
21 depositions of the class representatives and other discovery issues are scheduled over the next few
22 weeks in anticipation of the class certification motion deadlines). This will reduce unnecessary
23 burden on the Court and avoid the unnecessary expenditure of the parties' funds and resources
24 that can otherwise be used for settlement. Moreover, the parties' counsel wish to focus on
25 drafting the required settlement documents rather than engaging in continued litigation efforts
26 which, in all likelihood, will prove to be unnecessary.

27 4. The parties will either present the proposed settlement to the Court for preliminary
28 approval within 30 days or inform the Court of the status of the matter and request appropriate

1 scheduling changes at that time. The parties are motivated to complete the settlement documents
2 and will work diligently toward that end.

3 SO STIPULATED.

4
5 Dated: January 28, 2009.

BRAMSON, PLUTZIK, MAHLER &
BIRKHAEUSER, LLP

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8 By: _____/s/
Robert M. Bramson

9
10 David J. Marshall
marshall@kmblegal.com
11 Debra S. Katz
katz@kmblegal.com
12 KATZ, MARSHALL, BANKS, LLP
1718 Connecticut Ave., N.W., Sixth Floor
13 Washington, D.C. 20009
Telephone: (202) 299-1140
14 Facsimile: (202) 299-1148

15 Gary Peller
peller@law.georgetown.edu
16 Professor of Law
GEORGETOWN UNIVERSITY LAW
17 CENTER
600 New Jersey Avenue, N.W.
18 Washington, D.C. 20001
Telephone: (202) 662-9122
19 Facsimile: (202) 662-

20 Attorneys for Plaintiffs
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1 Dated: January 28, 2009.

FARELLA BRAUN & MARTEL LLP

2
3 By: _____/s/
C. Brandon Wisoff

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5 Attorneys for Defendants
BLUEHIPPO FUNDING, LLC and
BLUEHIPPO CAPITAL, LLC

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7 *I hereby attest that I have received authority
from the other counsel signatories to file this
document.*

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9 **[Signatures Continued on Next Page]**

10 Dated: January 28, 2009

QUINN EMANUEL URQUHART OLIVER
& HEDGES

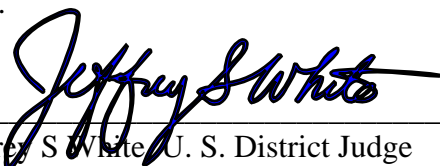
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12 By: _____/s/
Jeffrey D. McFarland

13
14 Attorneys for Defendant
GATEWAY, INC.

15
16 **~~[PROPOSED]~~ ORDER**

17 In accordance with the above stipulation and for good cause shown, IT IS SO ORDERED.

18 Dated: January 29 _____, 2009.

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20 
Jeffrey S. White, U. S. District Judge